

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

MINNIE TAYLOR, Individually and  
as Personal Representative of  
the ESTATE OF LOUIE TAYLOR,  
and HAROLD CUTHAIR,

Plaintiffs,

vs.

Case No.

21-cv-00613-GJF-JFR

THE UNITED STATES OF AMERICA,

Defendant.

**DEPOSITION OF MINNIE TAYLOR**

April 5, 2022

8:30 a.m.

via videoteleconference

PURSUANT TO THE FEDERAL RULES OF CIVIL  
PROCEDURE, this deposition was:

TAKEN BY: MS. CHRISTINE H. LYMAN

Attorney for the Defendant

REPORTED BY: MABEL JIN CHIN, NM CCR #81

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<p style="text-align: right;">10</p> <p>1 Q. And when did you move from Utah to Shiprock?</p> <p>2 Do you remember?</p> <p>3 A. Well, I was brought here by my mother when I</p> <p>4 was a year old, so I have been living here in</p> <p>5 Shiprock.</p> <p>6 Q. And are your parents still alive,</p> <p>7 Mrs. Taylor?</p> <p>8 A. No.</p> <p>9 Q. Okay. When did your father die?</p> <p>10 A. I only had my mom.</p> <p>11 Q. Your mom is still alive?</p> <p>12 A. No, she is deceased.</p> <p>13 Q. Okay. So you don't know, I guess, what</p> <p>14 happened to your father, then?</p> <p>15 A. I don't know.</p> <p>16 Q. And when -- what was your mother's name?</p> <p>17 A. Helen, Helen Begay.</p> <p>18 Q. And when did she pass away?</p> <p>19 A. April of 2020.</p> <p>20 Q. Oh, no. I'm sorry about that. That's --</p> <p>21 you had a lot going on at that time already.</p> <p>22 A. Yes.</p> <p>23 Q. Did you have any siblings growing up?</p> <p>24 A. No. Siblings, does this mean brothers and</p> <p>25 sisters?</p>	<p style="text-align: right;">12</p> <p>1 A. I just interviewed clients, with people that</p> <p>2 worked in the mines, mining area.</p> <p>3 Q. And what --</p> <p>4 A. Mostly case work and interviews and travel</p> <p>5 here and there.</p> <p>6 Q. And was that in Shiprock?</p> <p>7 A. Yes.</p> <p>8 Q. And what kind of claims are being filed with</p> <p>9 regard to the uranium mine?</p> <p>10 A. Mostly were miners, transporters and</p> <p>11 millers. And they also include people, janitors</p> <p>12 working in the mine area and those --</p> <p>13 Q. Okay. So these are people who got sick from</p> <p>14 working or being near the mines; is that right?</p> <p>15 A. Yes.</p> <p>16 Q. And how long had you been doing that kind of</p> <p>17 work before you retired?</p> <p>18 A. Um -- from there -- um -- I started back in</p> <p>19 2015. I don't remember the date, but it was in</p> <p>20 October 2015 all the way up to 2019 when I retired.</p> <p>21 Q. And Mrs. Taylor --</p> <p>22 (A discussion was held off the record.)</p> <p>23 Q. So Mrs. Taylor, before you worked in the</p> <p>24 uranium mine, what other jobs did you have?</p> <p>25 A. I worked in various different places, like,</p>
<p style="text-align: right;">11</p> <p>1 Q. So -- so when you were in Shiprock was it</p> <p>2 just you and your mom?</p> <p>3 A. Yes.</p> <p>4 Q. Did your mom ever remarry or have a</p> <p>5 boyfriend living with you?</p> <p>6 A. No.</p> <p>7 Q. Mrs. Taylor, can you tell me about your</p> <p>8 schooling? How much schooling have you had?</p> <p>9 A. I -- I graduated 19- -- I can't remember</p> <p>10 now. And I went to one year of junior college.</p> <p>11 That's about it.</p> <p>12 Q. Do you recall what you studied in junior</p> <p>13 college?</p> <p>14 A. It was just the general courses.</p> <p>15 Q. And so I see here on the screen it says</p> <p>16 occupation, it says retired, 11/21/2019. Can you tell</p> <p>17 me what you retired from?</p> <p>18 A. I was working for Navajo Nation.</p> <p>19 Q. Can you tell me what you did for Navajo</p> <p>20 Nation?</p> <p>21 A. I was working with the Navajo Uranium</p> <p>22 Office.</p> <p>23 Q. And what did you do for that office?</p> <p>24 A. I was a caseworker there.</p> <p>25 Q. Can you describe what that means?</p>	<p style="text-align: right;">13</p> <p>1 I worked in -- um -- business departments, like,</p> <p>2 Dillard's Department Store, Ross Department Store, and</p> <p>3 just, you know, different -- different places.</p> <p>4 Q. Were you working at -- doing office work or</p> <p>5 were you working in sales? What kind of --</p> <p>6 A. Working -- working in sales.</p> <p>7 Q. Mrs. Taylor, do you recall while your son</p> <p>8 Louie was growing up what kind of jobs you had?</p> <p>9 A. It's what I just mentioned under Navajo</p> <p>10 Nation and different sales, department stores, so I</p> <p>11 always had a job.</p> <p>12 Q. Okay.</p> <p>13 A. And some of them were, like, temporary, and</p> <p>14 full-time, and sometimes I'll take a part-time job.</p> <p>15 So I always worked.</p> <p>16 Q. Well, I want to turn now to Mr. Cuthair. He</p> <p>17 is a co-plaintiff. He is also a plaintiff in this</p> <p>18 case. Can you tell me about your relationship with</p> <p>19 Mr. Cuthair and? I am hoping I'm pronouncing it</p> <p>20 correctly.</p> <p>21 A. Can you rephrase that and make it more</p> <p>22 simple of what you mean by that?</p> <p>23 Q. Well, how did you meet Mr. Cuthair?</p> <p>24 A. Um -- okay. That's another job that I was</p> <p>25 working in Towaoc, Colorado, Towaoc Ute Mountain</p>

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1 Health Center. That's where I met him, and I was with  
2 him and we went our separate ways the year of 1993.

3 Q. Were you married to Mr. Cuthair?

4 A. Just common law.

5 Q. Did you have any other significant  
6 relationships with people other than Mr. Cuthair?

7 A. No.

8 Q. Were you ever married?

9 A. Just common law. And I'm a single -- single  
10 parent after that. I have been a single parent with  
11 my two boys -- two sons.

12 Q. So, I guess I'm wondering how you have the  
13 last name Taylor if your mother was Begay and your  
14 common-law husband was Mr. Cuthair, where does the  
15 name Taylor come from?

16 A. I'm trying to think all of these -- I just  
17 couldn't understand these names that my mom -- that my  
18 mom gave me. It was kind of, like, I don't know. My  
19 mom was an uneducated mother. She never went to  
20 school. And like I said, I was the only child.

21 Q. Did she give you the name Taylor?

22 A. Okay. On that one, Taylor, that was back in  
23 -- Taylor is back in -- I'm sorry, that I can't recall  
24 all these -- these names.

25 Q. But Taylor is your last name and was your

15

1 son's last name; correct?

2 A. Yes, Louie Dean Taylor.

3 Q. And I'm asking you, where does the name  
4 Taylor come from? Were you born Minnie Taylor? Is  
5 that on your birth certificate?

6 A. No.

7 Q. What was your name on your birth  
8 certificate?

9 A. It is -- it's my maiden name from -- um --  
10 on my -- oh, it was under my mom signed off on -- I  
11 think I have it at home. It's an old document that  
12 she put as Minnie Begay at first. That is on my -- my  
13 BIA birth certificate. That's what I had and -- go  
14 ahead.

15 Q. I'm sorry. At some point your name changed  
16 to Minnie Taylor, and I'm just asking you why did you  
17 change your name to Minnie Taylor?

18 A. Okay. On those years after I never changed  
19 the name, it was my mom just put me as Begay at first,  
20 and then with that name, it was -- um -- I can't  
21 remember -- I can't recall the year, the years that --  
22 um -- I wasn't thinking about these things at this  
23 time, at this moment, I told you. I just -- because  
24 with so many things due to going -- going through so  
25 much, and it's not all about the years all these

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1 things took place, it's not in my mind because I think  
2 of these things are in the past and so many things  
3 have happened and -- and all I'm focusing is -- is the  
4 loss of my loved one, and now it's just bringing back  
5 those -- things that stay in the past, and at that  
6 time -- it's so many years back that -- now, it's,  
7 like, right now, I'm just focusing on this, not in the  
8 -- not so many things in the past. Is that I was -- I  
9 was married before. It's Taylor, but he is deceased,  
10 and I can't recall the years.

11 Q. Okay. I'm not asking you about the years,  
12 Mrs. Taylor. I understand that this is hard to  
13 remember.

14 A. Yeah.

15 Q. And so, can I then -- so you said you were  
16 married to somebody named Taylor?

17 A. Yes, and he is deceased.

18 Q. Do you recall what -- what was his name?

19 A. Gene, G-E-N-E, Taylor.

20 Q. Were you married to Gene Taylor before or  
21 after you were with Mr. Cuthair?

22 A. Before, the first -- the first.

23 Q. And were you married to anybody other than  
24 Mr. Taylor?

25 A. No. And Harold was the common-law.

17

1 Q. Did you divorce from Mr. Taylor?

2 A. No. He just deceased.

3 Q. Okay. So you were married to Gene Taylor  
4 and then he died, and then --

5 A. Yes.

6 Q. -- you went with Mr. Cuthair; is that right?

7 A. Yes.

8 Q. Okay. You mentioned that you had two sons.  
9 Can you tell me their names?

10 A. Okay. There was Louie Dean Taylor, my  
11 oldest one. And my second youngest one is Karsten,  
12 K-A-R-S-T-E-N, Cuthair.

13 Q. Is Harold Cuthair Karsten's father?

14 A. Yes.

15 Q. And Harold Cuthair is also Louie's father;  
16 is that right?

17 A. Repeat that?

18 Q. Is Harold Cuthair also Louie's father?

19 A. Yes.

20 Q. Can you tell me Louie's date of birth?

21 A. 12 1986.

22 Q. And what about Karsten?

23 A. [REDACTED]

24 Q. So, you said that you separated from Harold  
25 in 1993? Is that right?

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1 dogs, cats, and he used to say, I want to be a  
2 veterinarian some day.

3 Q. While he was -- while he was in college did  
4 he continue to live at home or did he live --

5 A. Yeah.

6 Q. Did he live near the college?

7 A. He continued to stay, live with me.

8 Q. And so I noticed that there is about a  
9 four-year gap between when he left high school and  
10 when he got his GED. Can you tell me what he did from  
11 2004 to 2008?

12 A. He did work at the Ute Mountain Casino, the  
13 bingo hall, and he worked various jobs here in  
14 Shiprock, at a Video Shack, and then a Chinese  
15 restaurant here in Shiprock. At that time it was a  
16 different -- it was a different restaurant. And then  
17 he -- from there he worked -- he just worked to make  
18 some money, so -- he was into (unintelligible), and  
19 sometimes he liked to go and gamble.

20 Q. Okay. Well, I want to move to, on this  
21 exhibit, Exhibit 1, I think you did mention some of  
22 the things that are on there. Just a second here.

23 So interrogatory number 7 is asking about  
24 his employment. And so the first thing here was Ute  
25 Mountain Casino, 2009 to 2010, bingo clerk. So it

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1 looks like it was after he went to college; is that  
2 right?

3 A. Yes.

4 Q. Okay. And do you know why he left that job?

5 A. Like, from there -- from there to back home  
6 it's, like, 30 miles. It was a lot of wear and tear  
7 and cost of gas and all of that, so -- so he only  
8 worked there for a while.

9 Q. Did his father have anything to do with the  
10 casino?

11 A. Um -- I don't understand that question.

12 Q. Did his father work at the casino also?

13 A. No. He -- he had -- he had a lot of jobs  
14 also. He was councilman there, and he was also the  
15 chairman there, and he -- he did a lot of work in his  
16 own community also, and he also worked there before  
17 when it was open, part-time jobs.

18 Q. Okay. So we talked about the casino. Now,  
19 it says Shack clerk, Shiprock, New Mexico, 2008 to  
20 2009. Is that the video Shack you were talking about?

21 A. Yes.

22 Q. So can you tell me, is this, like, a video  
23 rental store?

24 A. Yes.

25 Q. And do you know why he left that job?

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1 A. Um -- he was like -- like -- um -- it's like  
2 -- coming from his brother, it's just, like, always  
3 work late shifts and getting off late and all that, so  
4 he worked there for a while and he left.

5 Q. You said coming from his brother. So, is  
6 that something that Karsten told you?

7 A. Yes. They shared a lot of things together,  
8 and I was the last to know.

9 Q. Okay. And then, the last thing in this  
10 response, it says Bamboo Chinese. Is that the  
11 restaurant you were talking about earlier?

12 A. Yes, it was a different restaurant at that  
13 time. It was a different company or business at that  
14 time, and he worked there as a waiter also.

15 Q. But you don't remember about what time  
16 period? Was it before he went to college or was it  
17 after?

18 A. It was, like, the same, after hours, after  
19 classes.

20 Q. So was it --

21 A. On the weekend. Weekends through -- the  
22 weekend job.

23 Q. Okay. So, after he was a bingo clerk at Ute  
24 Mountain Casino do you recall him having any other  
25 jobs?

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1 A. Um -- that's about it. That's about it.  
2 And most of the time -- and that -- like I said  
3 earlier, he likes to gamble, and he was making money  
4 off of that for himself. But he didn't share all that  
5 information, he didn't share all that with me because  
6 I thought that -- you know, he loved to gamble and he  
7 won quite a bit at times that -- so he had money for  
8 himself.

9 Q. So -- so are you saying that he didn't have  
10 a job because he could support himself by gambling?

11 A. Yes, I think so. And he will sometimes --  
12 um -- his dad, Harold, loved to gamble, too, so  
13 sometimes they would get together and go to some of  
14 these casinos and go gamble, win some money. And then  
15 that's how he -- how he had money all the time.

16 Q. Did he ever share this money with you?

17 A. Yeah. Sometimes he will buy -- he will buy  
18 me lunch and he will buy some groceries. And, you  
19 know, he is always being -- he was always being  
20 helpful. Gas money, here, mom, here's some money for  
21 your gas. Yeah, he was helpful.

22 Q. Did you keep track of all the times he  
23 helped you with money?

24 A. No. No. I'm a parent. I'm a parent where  
25 I have so much love for them and that I don't

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1 expect -- I don't expect this, and that, money and  
2 whatnot from -- from my sons.

3 Q. Do you know about roughly how much money he  
4 would give you per month?

5 A. No. I can't -- I can't recall that.

6 Q. I'm assuming that when you gamble sometimes  
7 you lose. Did Louie ever ask you for money if he  
8 lost?

9 A. No. No. He -- no. He never had, and --  
10 but with gas, you know, I'll help him, and I think his  
11 dad helped him sometimes when he needs gas.

12 Q. Did Louie have a car?

13 A. He had a car, yes and then -- and it broke  
14 down.

15 Q. What kind of car did he have?

16 A. It was just an old model, old model car, and  
17 it was -- it was a Cavalier, the old model car.

18 Q. Who bought the car? Did Louie buy it with  
19 his own money or did you guys buy it for him?

20 A. Yes, he did. He did, he got it on his own.

21 I don't know how much -- I don't know how  
22 much he paid on it. And he just paid on his own.

23 Q. Do you know if he had insurance on the car?

24 A. Yes.

25 Q. Did he pay for the insurance?

35

1 A. Yes.

2 Q. Do you know if he had a car payment or did  
3 he just buy it with cash?

4 A. No, with cash. No monthly payments.

5 Q. I'm going to go down to another one of these  
6 responses here.

7 Hold on a sec. I'm having trouble finding  
8 where I want to go, so --

9 Okay. So I'm going to go here to  
10 interrogatory 18. Oops --

11 A. I can't see that.

12 Q. Sorry. Let me make it bigger for you  
13 here. Is that better?

14 A. Yes.

15 Q. Okay. I asked here about his income, and  
16 you said -- your response was, "I am unsure.  
17 Employment income and gaming income is unknown to me."  
18 So you don't know how much money Louie was making  
19 through employment or gambling?

20 A. Yes, I'm unsure of all that.

21 Q. And I see that his father, Harold, "My son  
22 received 2,000 per year, and two bonus of \$200  
23 December and June from the Ute Mountain Tribe." Do  
24 you know what that is?

25 A. That's coming from their -- called per

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1 capita from the Ute Mountain Tribe, from their tribe.

2 I -- I don't really understand, but it just  
3 -- it's the tribe that they -- they provide with some  
4 money yearly and -- and on certain months it changes,  
5 so --

6 Mostly Harold should know all that, and my  
7 son, but I don't really -- I do not really know how  
8 all that works.

9 Q. Do you know if Louie got a check every month  
10 from the Ute Mountain Tribe?

11 A. Yes. Yes, they had.

12 Q. Where would he keep the money from these  
13 checks? Did he have a bank account?

14 A. I have no idea. I never -- I never got into  
15 his personal business. But like I said -- but, like,  
16 he did help me with groceries, and sometimes pay the  
17 light bill, but I just never did question all that.

18 Q. So when he got these checks, I mean, he was  
19 an adult living at home?

20 A. Yes.

21 Q. Did he pay rent?

22 A. No. It was just mostly light bill and  
23 groceries.

24 Q. But you don't know how much money he would  
25 give you per month?

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1 A. No. Just like I said, it's just mostly  
2 covers food and electric bill and some gas.

3 Q. So he was paying for your gas or his gas?

4 A. My gas.

5 Q. Did he give you cash to do this?

6 A. Yes. He will give me in cash most of the  
7 time, yes.

8 Q. So you don't know if he had a bank account  
9 or any credit cards?

10 A. No, I sure don't know.

11 Q. And did he have -- do you have a bank  
12 account that he had access to?

13 A. No. I do have a bank account.

14 Q. But he doesn't have access -- he didn't have  
15 access to it?

16 A. No.

17 Q. So if Louie wanted to spend money on -- I  
18 mean, I don't know what he was into, but if he wanted  
19 to buy something for himself would he spend his own  
20 money to do that?

21 A. Yes.

22 Q. And you wouldn't give him money?

23 A. No. Only if he needed gas sometimes, yes.

24 Q. Did he have a phone?

25 A. Um -- not for a long time. Not for a long



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1 time. And he didn't -- I don't know, for some reason  
2 he didn't really -- really wanted to have a phone.

3 And -- yeah, he really did have a phone.

4 Q. How did he pay for the phone?

5 A. It was just a free phone under that -- um --  
6 that they call -- Cellular 1 on the reservation.

7 Q. Did he pay for his own cell phone?

8 A. It was only, like, just -- just a regular  
9 phone, like, \$20 a month.

10 Q. So did you pay for it?

11 A. No, he did.

12 Q. Were you on the same phone plan?

13 A. No.

14 Q. So did Louie do any chores around the house?

15 Tell me how he, I guess, helped you around the house?

16 A. Yes, he had. He helped clean the house. He  
17 didn't like -- he didn't like a messy house, and he  
18 was a clean, clean person. He kept his room nice and  
19 clean, organized and -- organized, and he kept  
20 everything in order. And like I said, he liked to be  
21 organized. And he helped -- yeah, he helped clean,  
22 and maybe he will sometimes -- he will, as he was  
23 growing up, he was always rearranging stuff around and  
24 -- and he was an organized person.

25 Q. Did he clean just his room or did he clean

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1 other areas of the double-wide?

2 A. Other areas. And his room has always been  
3 cleaner than my youngest son's room.

4 Q. Does your youngest son still live with you?

5 A. Yes.

6 Q. Did Louie do any cooking for the family?

7 A. He wasn't really into cooking. He doesn't  
8 -- my youngest son does cooking, but he is into  
9 cleaning, and he is not -- he is not a cooking person.

10 Maybe just -- maybe just, like, fast food,  
11 warm up stuff, and that's about it. He is not into  
12 cooking.

13 Q. Did Louie pay for his own food?

14 A. Yes.

15 Q. Did he buy food for you?

16 A. Yes.

17 Q. Was that groceries, or did he go to fast  
18 food, groceries?

19 A. No, groceries, and sometimes fast food, but  
20 he was pretty much into his own fast food.

21 He would buy groceries, but he will buy  
22 groceries and his brother would do the cooking.

23 Q. Did he know what groceries to buy or did you  
24 give him a list?

25 A. No, knows. He knows what to get. He knows

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1 what we all like to eat.

2 Q. How often did he go grocery shopping for you  
3 guys?

4 A. Um -- say, maybe twice a month.

5 Q. Did you ever go with him?

6 A. Um -- sometimes, not all the time.  
7 Sometimes he will go do his own. Sometimes I will go  
8 with him.

9 Q. Um -- did Louie do any laundry?

10 A. Yes.

11 Q. Did he do his own laundry?

12 A. Yes.

13 Q. Or did he do it for the rest of the family?

14 A. No. He always loved to do his own laundry.  
15 He did his own laundry and everything on his own.

16 Q. You said that Louie's car broke down. Did  
17 it ever get fixed?

18 A. No.

19 Q. After it broke down how did he get around?

20 A. He just sometimes shared -- shared a  
21 vehicle.

22 Q. And that would be your vehicle?

23 A. Yes.

24 Q. What kind of vehicle is that?

25 A. Um -- it was first it was a Ford SUV, and it

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1 broke down. And another one was -- another small car,  
2 Ford Focus, and it also broke down. So, now I -- I  
3 have a -- a Forte, Kia Forte.

4 Q. So while Louie was living with you he always  
5 had access to a vehicle; is that right?

6 A. Yes.

7 Q. Did he have a driver's license?

8 A. Yes.

9 Q. Did he do any other chores or any help  
10 around the house that we haven't talked about?

11 A. Mostly a lot of cleaning. He put things in  
12 order. Feed -- feeding the dog.

13 Q. How many dogs do you have?

14 A. Like I said, like I had said earlier, he is  
15 the type that has a love for animals, any kind of  
16 animal, and he rescued -- he rescued the ones I have.  
17 I have, like, three that he rescued, and altogether we  
18 -- it was eight right now, and there were some here  
19 and there, and he really had a heart for animals and  
20 he rescued them. And -- and now I still have them,  
21 and anything to do with animals. He had a heart for  
22 animals and horses. And I was surprised, he said, one  
23 of these days I would love to have a -- not porcupine,  
24 but a raccoon. He said he wanted to have a raccoon.  
25 I want to have a raccoon.

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1 makes me cry every time I see where he used to go.

2 So exercise was his first priority.

3 Q. So other than exercise, did he have any  
4 other hobbies that he liked to do?

5 A. Um -- dancing. He loved to dance, which is  
6 called -- when he was growing up, but he was -- he was  
7 a break dancer, and he danced a lot. And --

8 Q. Did he dance in a particular location?

9 A. Yeah. That's when he was going to high  
10 school, he was just going to a lot of dances then, and  
11 he would travel some with some of his friends to go  
12 dancing. And that's where he picked up a lot of  
13 exercise, and he never gave up. He was always in good  
14 health. He never had any problems, like, colds,  
15 getting sick, and he was never on any medications and  
16 he was always in good health. And that's why he  
17 always talked to us, you guys need to stay healthy, do  
18 this and that. That was his life every day.

19 Q. How much time did he spend outside of the  
20 home during the day? Was he mostly gone during the  
21 day or did he --

22 A. Yes, he was mostly gone. He was mostly  
23 gone. He -- he just did so much of all that every  
24 day. He loved to travel, and he was never -- he was  
25 hardly home. Never -- never was the type that -- he

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1 never stayed home and lay around doing nothing. He  
2 was always -- he was always out of the home, and  
3 that's where he will be at, at the aquatic center,  
4 that exercise or swimming, or either he is out  
5 somewhere hiking and jogging. That was -- that was  
6 his days all the time.

7 Q. Did he have a particular group of friends  
8 that he liked to hang out with?

9 A. Yeah. They were all into the same thing,  
10 dance, dancing, and some runners.

11 Q. Did you know who he was hanging out with  
12 outside of the home?

13 A. Um -- not really, but I named a few of them  
14 and their parents. I knew some of their parents.  
15 Other than that, I -- he had -- he had so many  
16 friends. He had a lot of friends. But I didn't know  
17 -- I didn't know all of them, just certain ones I knew  
18 their parents.

19 Q. Did they ever come to your house to hang  
20 out?

21 A. No, they didn't. They didn't hang out at my  
22 house, but they would stop by or just talk with him.  
23 But they never hang around. They never hang around my  
24 house.

25 Q. Did Louie come home for meals? When would

52

1 you see him during the day?

2 A. Sometimes he will hardly -- like I said, I  
3 have always worked and -- and sometimes, you know, he  
4 will come home, quick, and he will be gone again,  
5 and -- but I said he was hardly home.

6 Q. So, we talked about him going to the gym and  
7 we talked about him hanging out with his friends, and  
8 we talked about -- well, I guess -- well, I guess you  
9 talked earlier him liking to go gamble with his  
10 father. What other things did Louie like to do?

11 A. Travel. He loved to travel.

12 Q. Where would he travel to?

13 A. Um -- he has been to -- he has been to -- he  
14 has been to Las Vegas a lot of times. He went to that  
15 with some friends. I, myself, have never been to  
16 Vegas, but he has. And he did that, loved going to  
17 Vegas. So he has been there I don't know how many  
18 times. And so he loved outdoors pretty much.

19 Q. So -- but he didn't have a job; is that  
20 right?

21 A. No. No, not -- not a permanent job. Like I  
22 said earlier, he was planning to, really thinking  
23 about attending college with his brother. That was  
24 part of his plan. With his brother, with the last --  
25 before he --

53

1 Q. Would you say that Louie lived under your  
2 roof but you had separate lives?

3 MR. BUFFINGTON: Objection, form. Answer if  
4 you can.

5 A. Repeat that?

6 Q. Well, Louie lived in your house but it  
7 sounds like he was out of the house a lot; is that  
8 right?

9 A. Yes.

10 Q. And you weren't really involved in what he  
11 was doing; is that right?

12 A. Pretty much he -- he enjoyed what I  
13 explained and I supported him on all that.

14 Q. But he was doing these activities on his own  
15 without you; is that right?

16 A. Um -- um -- yeah, going to -- I'm not a  
17 gambler, so pretty much he did a lot of these things  
18 on his own. Sometimes he gets involved with his dad,  
19 so -- but I'm not a gambler, so I didn't -- I didn't  
20 get involved going to casinos and stuff like that.

21 Q. So is it fair to say that you had separate  
22 interests from your son?

23 A. Only -- only with exercise. I -- I agree  
24 with him and I do a lot of walking myself with my  
25 dogs, and my son does a lot of walking and exercise,

54

1 too, right now, so -- pretty much -- pretty much we  
2 join him in that area.

3 Q. Are you saying that you would go on walks  
4 with Louie?

5 A. Um -- not really with him, but like I said,  
6 he pretty much -- he is into more, more into, like,  
7 hiking and deep canyon walks and climbing and all  
8 that, but I'm not into that one. It's just the  
9 walking. Walking, like, maybe three miles straight  
10 with my dogs and my youngest son and -- but sometimes  
11 my son will join him, but not me. And just walking.

12 Q. Okay. So Louie liked to do very difficult  
13 physical activities, then?

14 A. Yes. Yes.

15 Q. Okay. And those were ones that you weren't  
16 able to participate in?

17 A. No.

18 Q. No, you weren't able to participate?

19 A. I could have if I wanted to, but that's a  
20 lot -- a lot for me to do because he does so much. He  
21 is sweating and tiring, and he has to climb, and I  
22 don't think I can handle that, but he can. He enjoyed  
23 that with his brother. But with me, I would rather  
24 just walk, walk miles straight, not climbing or up the  
25 canyon. No, that's too much for me.

55

1 Q. Other than Bioncha Benally do you know of  
2 any other girlfriends that Louie might have had?

3 A. No.

4 Q. Is it possible he had a girlfriend and you  
5 didn't know about her?

6 MS. LYMAN: Can you guys still hear me?  
7 Forrest? You guys aren't on the screen anymore.  
8 (Brief loss of Witness' video connection.)

9 Q. (By Ms. Lyman) Okay. So, before you guys  
10 cut out, I asked if it was possible that Louie might  
11 have had a girlfriend you didn't know about.

12 A. No.

13 Q. So you think that if he had a girlfriend you  
14 would know about her?

15 A. Yes.

16 Q. Were there any girlfriends before Bioncha?

17 A. No. He just mainly has -- he has had a lot  
18 of friends that I know of -- he knew -- he knew a lot  
19 of people here, guys and girls, so --

20 Q. So Louie didn't have any children; is that  
21 right?

22 A. No.

23 Q. And he was never married?

24 A. No.

25 Q. And he didn't have a common-law wife or

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1 anything like that?

2 A. No.

3 Q. All right. Mrs. Taylor, I'm going to go  
4 back to sharing my screen, and we're going to go back  
5 to Exhibit 1, and I'm going to scroll up to  
6 interrogatory number 10 now.

7 So interrogatory number 10 asked about  
8 healthcare, health treatments, things like that. And  
9 your answer here is, "To the best of my information  
10 and belief, I am unaware of any health issues with  
11 Louie. He never had healthcare or mental healthcare.  
12 He never had any care or needed any care for substance  
13 or alcohol abuse and was never at a facility for  
14 substance or alcohol abuse. Louie was in good health  
15 and was never on any medication." Is that all true?

16 A. That's exactly all true.

17 Q. And is that true for his entire life, or are  
18 you just talking about the last ten years?

19 A. Yes. No, it's all his life.

20 Q. So, I'm going to go open up a new exhibit  
21 here, and it's some medical records that we received  
22 from Northern Navajo Medical Center, and so I'm just  
23 going to ask you a few questions about some of these  
24 records. And I apologize, because they are hard to  
25 read because some of them are handwritten, but I'm

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1 going to show you this first. These are all medical  
2 records.

3 MS. LYMAN: And Mabel, I would like to mark  
4 this as Exhibit 3.

5 (Exhibit 3 marked.)

6 Q. (By Ms. Lyman) And so I'm going to show you  
7 this first page and I'm going to scroll down because I  
8 believe this record is from 1990. That's the date  
9 down here. And I was going to ask you about this  
10 because it states that "Mom called me yesterday," and  
11 this is a note from a nurse. It says you were crying  
12 and worried about Lamar. Is that Louie?

13 A. Can you repeat that year?

14 Q. 1990. So I think Louie would have been  
15 about 3 years old?

16 A. I can't -- I can't recall that.

17 Q. Okay. And the reason I wanted to ask you  
18 about this is because it says that you were worried  
19 about your son, and it mentions that -- and it's  
20 really hard to read, I know -- but that they wanted  
21 you to bring Louie to the ER because he was close to  
22 the hospital. Do you remember him going to the  
23 hospital as a child?

24 A. I think that's -- that's on -- he had -- he  
25 was with asthma when -- he was born with asthma and



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1 A. She thought I was drunk, but I did panic due  
2 to my son's asthma. I know. I remember that at one  
3 time it was -- it was really bad where I had to call  
4 and tell them that I had to run my son over because he  
5 -- he is turning -- turning purple or something, and I  
6 panicked and I ran him over there, just grabbed him  
7 and took him over there. It was at night. I think  
8 that's what she is talking about. That's a wrong  
9 statement right there on me. I never, ever drunk. I  
10 never drink, and I'm not a drunk parent, whatsoever.  
11 Never, ever have.

12 Q. Okay. Again, I apologize. I had to ask you  
13 about it. But I saw it and it kind of shocked me  
14 because I have never seen anything like that in a  
15 record before.

16 A. That is really uncalled for.

17 Q. Okay. So -- but you do recall, then, that  
18 he had asthma issues at least as a child?

19 A. Yes. Yes. Uh-huh. Yes.

20 Q. And so was it normal for your mother to be  
21 the one at home during the day with your -- with Louie  
22 when he was young?

23 A. Yes. Both of them, yeah, because she always  
24 offered. She always told me -- they were so close  
25 with their grandma, and she told me, never, ever take

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1 the kids to anybody that you don't know. I would  
2 never leave my grandkids with anybody. I want to keep  
3 them and make sure I know where they are and I know  
4 they are safe and everything. That's what she told me  
5 all the time when I was at work, and she always took  
6 good care of them.

7 Q. I believe, Mrs. Taylor, that you said that  
8 until 1993 Harold was living with you guys?

9 A. Up to '93.

10 Q. So this record is from 1990. Would Harold  
11 have been at home with the kids?

12 A. No. No, he -- he had a full-time job also.  
13 He always worked, just like -- just the way I always  
14 had to be at work.

15 Q. Okay.

16 A. And he was also employed.

17 Q. So when you and Harold were working, then  
18 your mother would watch the boys during the day?

19 A. Yes. Yes.

20 Q. Okay. I'm going to move on to the next  
21 medical record, and this is a record -- I'm going to  
22 go down here -- from 1994, so I think this would be  
23 after Harold left. And I wanted to ask about this  
24 record because it talks about the patient is in 2nd  
25 grade, lives with natural mother and a younger

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1 brother. So that would be Karsten?

2 A. Yes.

3 Q. "Grandmother is primary caretaker," and it  
4 says "Parents divorced. Father is ETOH," and that  
5 means alcohol dependent, and abuser marijuana." Do  
6 you know what that's referring to?

7 A. No. He never -- he never was an abuser.

8 Q. Well, substance abuser, they are talking  
9 about alcohol and marijuana.

10 A. No. No with alcohol. It's like he  
11 wasn't -- he was never an alcoholic. It's just --  
12 it's just once in a great while he will have alcohol.

13 Q. So you don't believe that this is correct?

14 A. No. No. He always worked. He was a hard  
15 working father, and he is really supported us with  
16 income and all that. He was never -- no, that is  
17 wrong right there.

18 Q. Okay.

19 A. He always had a job. He always had a job  
20 and he worked really extra hard to bring income and  
21 support, support us.

22 Q. So even after he left he still supported  
23 you?

24 A. Yes. I mentioned that he came by to support  
25 the boys, and he took them at times, and he helped us

65

1 with -- with clothes and whatever they were in need,  
2 and he was still supportive.

3 Q. Okay. I'm going to continue reading this  
4 record. It says "patient," and that would be your son  
5 Louie, "has behavioral problems at school and home.  
6 Patient admits to hitting, kicking and swearing at the  
7 teacher and mother." Do you have any recollection of  
8 Louie doing these things when he was about 8 years  
9 old?

10 A. No. No. It's just -- it was -- it was it's  
11 the way the things are written and it's like it's so  
12 harsh and everything but, no. It's just like the kids  
13 things as they're growing up. But this is -- this is  
14 -- this is way, way too much.

15 Q. Too much of what?

16 A. Whoever wrote this, that's not -- that's not  
17 him. It's at this -- sometimes, you know, kids will  
18 throw a fit, but this is -- this is not the way -- the  
19 way he was, no.

20 Q. Okay. Because the note says "Patient feels  
21 angry at mother because she is mean. She spans me."  
22 Is that true?

23 A. No. I'm not mean. No. No. No. No.

24 Q. You never spanked him?

25 A. No, I just -- as the way the parents

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1 adult?

2 A. No.

3 Q. You said he was very health conscious. Why  
4 do you think he didn't go to the doctor?

5 A. Well, he never -- I never -- I never -- as  
6 he had gotten older I never noticed him being sick or  
7 saying, I'm sick, I don't feel well, or I'm coughing,  
8 I caught a cold and I have asthma, or anything like  
9 that. So on this I think he might have went on his  
10 own but he didn't tell me. But I never saw him sick  
11 and just laying in bed for days, or see him coughing  
12 or can't breathe, or anything like that. I never -- I  
13 never recall that, him being sick or anything.

14 Q. Do you recall Louie ever having mental  
15 health issues?

16 A. No.

17 Q. Do you recall Louie ever abusing alcohol?

18 A. No. Once in a great while, but it's not  
19 like being drunk every day, and he wasn't like that.  
20 But, yes, he will -- he will at times, but he was --  
21 he wasn't -- he didn't have that addiction with  
22 alcohol or drugs that I know of.

23 Q. Do you know if Louie ever took cannabis or  
24 marijuana?

25 A. I have no idea.

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1 Q. So if he did, it might not have been at your  
2 house?

3 A. Never, never around me. Those things --  
4 those things aren't allowed, as a mother, alcohol and  
5 drugs or anything like that, so, no.

6 Q. Did you ever see Louie keep alcohol in the  
7 home?

8 A. No. No.

9 Q. Do you know if he went out to any bars, or  
10 places like that, to drink?

11 A. I -- I don't know.

12 Q. All right. I'm going to go down to the next  
13 page. This is a note from 2008. Luckily this is  
14 printed. And it says the clinic is Mental Health. Do  
15 you recall Louie going to a mental health clinic in  
16 Shiprock in 2008?

17 A. No, not that I know of. No.

18 Q. Okay. I wanted to alert you to the purpose  
19 of visit. It says "anxiety disorder, alcohol abuse,  
20 unspecified, cannabis abuse, unspecified." Do you  
21 recall Louie seeking treatment for any of these  
22 conditions?

23 A. No.

24 Q. Is it possible that Louie had those  
25 conditions and you just didn't know about them?

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1 A. I don't know. I was never aware of  
2 anything, no.

3 Q. So he never tried to talk to you about  
4 having problems with alcohol or cannabis?

5 A. No. What is that? My question, what is  
6 cannabis? What is that?

7 Q. So cannabis, I believe, is marijuana.

8 A. Oh. No. He never -- he never, ever  
9 mentioned these things. I wasn't aware of this.

10 Q. Is it possible that maybe he talked about  
11 these problems with somebody other than you?

12 MR. BUFFINGTON: Objection, foundation.

13 A. Not to my knowledge, I don't think that --  
14 no.

15 Q. So if he was having problems who would he  
16 normally talk to about these problems?

17 A. I don't think anybody.

18 Q. You don't think he would talk to his father?

19 A. I don't think so.

20 Q. What about Karsten?

21 A. I -- I don't know. He never -- never  
22 mentioned anything at all that I am aware of. I don't  
23 think so.

24 Q. Okay. But he did, it looks like, try to get  
25 help from Shiprock, from the Northern Navajo Medical

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1 Center, so is it possible he was getting treatment for  
2 things you didn't know about?

3 A. I think so.

4 Q. Okay. I'm going to move on to another  
5 treatment note from 2008. It's an Operation Report.  
6 Do you recall Louie having an operation in 2008?

7 A. Yes, I remember. I remember his  
8 gallbladder, yes.

9 Q. So tell me what issues he was having with  
10 his gallbladder?

11 A. I really can't recall all these things at  
12 all, but I just remember that he did go through that  
13 surgery.

14 Q. So you don't remember exactly why he needed  
15 the surgery?

16 A. I can't recall that. You know, as you get  
17 older you don't remember these things. And I'm over  
18 70 now and I can't really recall all these, little by  
19 little, inch by inch of everything. And I just  
20 remember -- I just remember the operation by reading,  
21 and that's it. I don't remember every detail.

22 Q. Do you remember how Louie recovered from the  
23 surgery? Do you remember, was it a hard time for him?

24 A. He didn't -- um -- he didn't -- he didn't  
25 have a hard time. I think he -- I recall that he

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1 intoxicated in February of 2019?

2 **A. No. No.**

3 Q. Would you have allowed him to take your car  
4 for that purpose, to go to the casino?

5 **A. At times, yeah, sometimes, but not all the  
6 time. But I wasn't aware of this at all.**

7 Q. If you knew that Louie was going to drink at  
8 the casino, would that have concerned you if he had  
9 your car keys and your car?

10 **A. Yes. It's always a concern, but it's --  
11 it's not all the time.**

12 Q. Okay. I'm going to keep scrolling down  
13 here.

14 I believe it states somewhere on this  
15 record -- and I apologize that I'm not finding this  
16 quickly -- that he was released on a personal  
17 recognizance bond. It's right here. Do you have any  
18 knowledge of this bond? Did you pay this bond?

19 MR. BUFFINGTON: Objection, form and  
20 foundation.

21 **A. No.**

22 Q. To your knowledge, would Louie have had  
23 money to pay for this himself?

24 **A. I'm pretty sure.**

25 Q. Do you recall Louie having to go up to court

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1 to intoxication, driving under the influence. Do you  
2 believe that Louie had a drinking problem?

3 **A. No, not -- not to my knowledge. I don't  
4 think so.**

5 Q. Did you ever encourage him to seek help for  
6 drinking?

7 **A. No, all I -- all I told him was that, you  
8 know, you just need to -- um -- to not be doing that,  
9 and that's about it. But I did tell him sometimes,  
10 you know, talk about it, but that's about it.**

11 Q. If you had known that he was having some  
12 issues with alcohol and getting in trouble for it,  
13 what do you think you would have done?

14 **A. Well, as much as I can. I -- I just, you  
15 know, have talked with him and all that but, you know,  
16 he still say that I don't have a problem. I don't  
17 have any kind of issues.**

18 Q. So do you think Louie, if you had talked to  
19 him about it, would not have been honest with you?

20 **A. I don't know.**

21 Q. Well, other than the incidents that we have  
22 talked about just now, are you aware of any other  
23 arrests or court activities for Louie that happened?

24 **A. No. All those I wasn't really aware of it.**

25 Q. Were you aware of any juvenile criminal

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1 in Colorado related to this incident in April of 2019?

2 **A. I think pretty much he took care of things  
3 on his own. I'm not aware of this, either.**

4 Q. Okay. I'm going to turn to the last page of  
5 this exhibit. Um -- this is agreement for release on  
6 personal recognizance dated January of 2020, and the  
7 charges appear to be possession of liquor, criminal  
8 impersonation and threatening. Do you have any  
9 knowledge of this incident?

10 **A. No, I don't. I'm not aware of it.**

11 Q. So this incident it looks like it happened  
12 about two months before Louie's death. You don't  
13 recall him being in jail or being arrested shortly  
14 before his death?

15 **A. No, I don't.**

16 Q. Do you happen to know -- this says  
17 threatening. Do you have any knowledge of somebody he  
18 might have been threatening?

19 **A. No.**

20 Q. So you had no involvement in this incident;  
21 correct?

22 **A. No.**

23 Q. It wasn't you he was threatening?

24 **A. No.**

25 **Q. So we have seen numerous records that refer**

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1 activities, anything that happened before he was 18?

2 **A. No.**

3 Q. Okay. Mrs. Taylor, I'm going to stop  
4 sharing this exhibit. There you are.

5 And I'm sorry, but, I'm going to have to  
6 turn now to the incident that happened. I know it's  
7 very painful for you, so if you ever need a break or  
8 want to stop or have a time out, just let me know, and  
9 that's perfectly fine. And -- um -- this is something  
10 that we have to get into for this case, and I  
11 apologize in advance. I don't want to hurt your  
12 feelings or make it painful, but I think that it's  
13 going to happen, you know, because of -- because of  
14 the way you feel about it, so I -- I guess we'll just  
15 move forward. just let me know if you need any time.  
16 Okay?

17 **A. Okay.**

18 Q. So I wanted to ask you first about the weeks  
19 is leading up to the incident. And when I say the  
20 incident, I am referring to what happened on February  
21 29th, 2020. Do you recall Louie acting any different  
22 or being concerned about him for any reason?

23 **A. Yes. What I saw is -- I never saw him -- I  
24 never saw him ever -- him, you know, hallucinating  
25 and -- and besides, I don't know how he -- different**

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1 I don't know. I just don't know. I pushed them,  
2 pushed them, tell them, help, help my son. Nothing.  
3 Now, I'm dealing with it every day, the pain, the  
4 hurt, the murder of my son. He had to suffer, suffer  
5 until his last breath. I deal with that now every  
6 day. Every day. Every day.

7 And just not -- it's really hurting my son  
8 (unintelligible) where he can't concentrate at times.  
9 He misses his brother. He feels the same way, really  
10 angry over his brother.

11 Q. So, Mrs. Taylor, after your son's death did  
12 any of those people who came by your house before ever  
13 come by again, just trying to visit you or talk to  
14 you?

15 A. No. No. I was just -- I was kind of  
16 wondering how they knew -- how they knew. Did they  
17 know that he is gone? To this day -- to this day I  
18 haven't seen anybody come by. And that's what really,  
19 really upsets me, too, waiting for anybody to show up  
20 at my door. And -- and I know it's coming from one of  
21 these people that provided -- that provided these  
22 things, gave it to my son.

23 Q. So you said that your son was very into his  
24 health and fitness?

25 A. Yes.

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1 Q. Do you have any idea why he would take some  
2 drugs that somebody just gave him?

3 A. I have no -- I have no idea, and -- and they  
4 knew, both of them, both of my boys knew that those  
5 things are dangerous. And -- and they knew. And I  
6 think -- I think it's all -- it just comes back down  
7 to his friends that probably set this -- I don't know  
8 what it will do to you or what -- or I don't know, and  
9 he just -- he just took it, and without even thinking  
10 what he is getting himself into.

11 Q. Mrs. Taylor, when --

12 MR. BUFFINGTON: Can you hear us?

13 Q. I asked if Louie had a phone when he died?

14 A. He -- he had -- he had it with him. He had  
15 it with him. So I never -- I never saw that phone. I  
16 never saw that phone. I don't know if they lost it  
17 somewhere or -- I did go around and check, but I never  
18 saw his phone so I don't know if -- I know he had it.

19 Q. Mrs. Taylor, did you try to search his room  
20 after his death to see if you could find any clues  
21 about what might have happened?

22 A. No. No. It's been -- it's been really  
23 tough and hard on my -- on myself and my son and  
24 everything. (Unintelligible) came back with my son,  
25 we did leave everything. We just left everything the

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1 way they are and we didn't -- to this day I done my  
2 best, I just don't have a heart to go in his room, go  
3 through everything. It's hard. It's my son, we don't  
4 go in there. We haven't gone in there yet. We are  
5 giving each other some time -- some time when that  
6 will take place. It's so much, that's how my -- we  
7 were really close and -- and to this day it's  
8 still left the way it is. I haven't gone in there.

9 And his brother doesn't go in there, either.  
10 He has all of his -- all of his belongings and his  
11 clothes and everything is still -- is still where he  
12 left it. Some day we will have the heart to go in his  
13 room.

14 Q. Mrs. Taylor, are you seeing any kind of  
15 counselor?

16 A. Yes.

17 Q. Is that Dr. Hanson?

18 A. It depends who is available, and I started  
19 off back in May 2019. I thought I was -- I thought I  
20 was going to die, and I was just really struggling  
21 with my life. I lost my son and -- and -- and that  
22 guy that I was seeing, he retired. So I went to some  
23 different ones, and I still go, and my next  
24 appointment is on the 18th again, this month, and --

25 Q. I requested your medical records but I

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1 didn't see anything about these visits. Which -- are  
2 you going to Northern Navajo or is there a special  
3 place you are going to?

4 A. I go to Northern Navajo. I saw the lady by  
5 the name of Pam, and then another one, Kellwood,  
6 Mr. Kellwood, and -- and -- yeah, I -- I --

7 Q. Is it hard for you to go back to that  
8 hospital?

9 A. Yes. Yes, it's been really -- it's  
10 really -- yes, bad memories, but -- but most of the  
11 time I just get on the phone, phone visits with my --  
12 with my counselor. And it is -- it is really hard  
13 going there at first for, like, my dental -- my dental  
14 and for eye appointments and stuff like that. Just  
15 really painful going there.

16 Q. Mrs. Taylor, during your counseling or any  
17 other medical visits have you been diagnosed with any  
18 kind of medical condition after your son's death?

19 A. Well, what I know for myself is that I'm  
20 just really forgetful, and sometimes -- sometimes when  
21 I'm driving I don't know where I'm driving -- I'm  
22 driving, where I'm going. And once I ran the red  
23 light because -- but I didn't get stopped, but it's  
24 just my loss of memory and lack of sleep at times.  
25 And I get -- and I get -- I get so weak thinking about